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 SHAC MT, LLC, David Michael Talla, and Peter Feinstein*

**IN THE UNITED STATES DISTRICT COURT  
 FOR THE DISTRICT OF NEVADA**

**CORRISA JONES, on behalf of herself  
 and on behalf of all others similarly  
 situated,**

**Plaintiffs,**

**vs.**

**SHAC, LLC, D/B/A SHAPPHIRE [sic]  
 GENTLEMEN'S CLUB; SHAC MT,  
 LLC, DAVID MICHAEL TALLA and  
 PETER FEINSTEIN,**

**Defendants.**

**Case No. 2:15-cv-01382- RFB-NJK**

**STIPULATION TO EXTEND TIME  
 FOR PARTIES TO FILE THEIR  
 JOINT PRETRIAL MEMORANDUM  
 [Dkt. 247] AND FOR DEFENDANTS  
 TO FILE THEIR REPLY TO  
 PLAINTIFFS' OPPOSITION TO  
 MOTION FOR RECONSIDERATION  
 OF ORDER GRANTING PARTIAL  
 SUMMARY JUDGMENT [DKT 241]  
 AND/OR TO ALTER JUDGMENT**

1           **COMES NOW**, Defendants SHAC, LLC, dba Sapphire Gentlemen’s Club, SHAC MT,  
2 LLC, David Michael Talla, and Peter Feinstein (collectively “Defendants”), by and through their  
3 undersigned counsel of record David Z. Chesnoff, Esq., and Richard A. Schonfeld, Esq., of the law  
4 offices of Chesnoff & Schonfeld, and Plaintiff Corissa Jones and all Plaintiffs who opted into the  
5 instant action (“Class Plaintiffs”) by and through their counsel David W. Hodges, Esq., and hereby  
6 Stipulate as follows:

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8       1.       On December 21, 2020, the Honorable Court Ordered that the request to seal the  
9 Order Granting Partial Summary Judgment was denied [Dkt 280]. As a result, the Honorable Court  
10 Ordered that Defendants file their Reply to the Opposition to the Motion for Reconsideration [Dkt  
11 245] by January 11, 2021. However, since that time the parties have agreed upon an amendment to  
12 the proposed FLSA Collective Action Settlement and are in the process of drafting said amendment.  
13 If this Honorable Court approves the FLSA Collection Action Settlement, as amended, it will render  
14 the Motion for Reconsideration Moot. The amended settlement will not include sealing or vacating  
15 the Order Granting Partial Summary Judgment;

16       2.       Accordingly, the parties hereby stipulate that the Defendant’s Reply to the Opposition to the  
17 Motion for Reconsideration (due on January 11, 2021) as well as the Joint Pretrial Memorandum  
18 (due on January 25, 2021), be due on February 5, 2021, so that the parties have an opportunity to  
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1 prepare the amendment to the FLSA Collective Action Settlement and seek court approval of the  
2 same.

3 **IT IS SO STIPULATED.**

4 Dated this 5<sup>th</sup> day of January, 2021.

5 **CHESNOFF & SCHONFELD**

6 /s/ Richard A. Schonfeld  
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**Counsel for Defendants**

**KENNEDY HODGES LLP**

/s/ David W. Hodges  
**DAVID W. HODGES (admitted *pro***  
***hac vice*)**  
**4409 Montrose Blvd, Suite 200**  
**Houston, Texas 77006**  
**Counsel for Plaintiffs**

11 **ORDER**

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13 **IT IS ORDERED** that the Parties Joint Pretrial Memorandum and the Reply to the  
14 Opposition to the Motion for Reconsideration [Dkt 245] are now due on February 5, 2021.

15 **IT IS SO ORDERED.**

16 Dated this 5<sup>th</sup> day of January, 2021.

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18 **RICHARD F. BOULWARE, II**  
19 **UNITED STATES DISTRICT JUDGE**  
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